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*Attorneys for Defendants*

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

## OFFICER GEORGE FORBUSH,

Plaintiff,

V.

CITY OF SPARKS, NEVADA; CITY  
MANAGER NEIL KRUTZ, in his  
individual and official capacities;  
ASSISTANT CITY MANAGER  
JOHN MARTINI, in his individual and  
official capacities; HUMAN  
RESOURCES DIRECTOR MINDY  
FALK, in her individual and official  
capacities; DOES 1-10,

## Defendants.

**Case No.: 3:21-cv-00163-MMD-WGC**

**STIPULATION FOR EXTENSION OF  
TIME TO REPLY TO PLAINTIFF'S  
OPPOSITION TO DEFENDANTS'  
MOTION TO DISMISS PLAINTIFF'S  
COMPLAINT, COMPLAINT  
PURSUANT TO FRCP RULE 12(b)(6),  
OR ALTERNATIVELY MOTION TO  
COMPEL ARBITRATION PURSUANT  
TO 9 U.S.C. § 4 (THE FEDERAL  
ARBITRATION ACT) AND DISMISSAL  
PURSUANT TO FRCP RULE 12(b)(1);  
ORDER**

## **(First Request)**

IT IS HEREBY STIPULATED by and between Plaintiff, OFFICER GEORGE FORBUSH, by and through his undersigned counsel, and Defendants, the CITY OF SPARKS, NEIL KRUTZ, JOHN MARTINI, and MINDY FALK, by their undersigned counsel that the Defendants may have an additional week, seven (7) days, up to and including July 26, 2021, to file a Reply to Plaintiff's Opposition to Defendants' Motion to Dismiss Plaintiff's Complaint, et.al., filed on July 12, 2021.

**STIPULATION FOR EXTENSION OF TIME TO REPLY  
TO PLAINTIFF'S OPPOSITION, ET. AL.; ORDER**

1           The reason for the extension requested is as follows:

2           Due to a number of scheduling conflicts between July 13, 2021 and July 19, 2021,  
3 including a jury summons for July 19, 2021, Defendants' counsel need additional time to review  
4 and respond to Plaintiff's July 12, 2021 Opposition. Defendants believe that the requested one-  
5 week extension is necessary to enable them to meaningfully evaluate Plaintiff's Opposition and  
6 prepare a Reply.

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**STIPULATION FOR EXTENSION OF TIME TO REPLY  
TO PLAINTIFF'S OPPOSITION, ET. AL.; ORDER**

This is the first request for an extension of time for this deadline requested by the Defendants. This stipulation is made with good cause and is brought in good faith.

RESPECTFULLY SUBMITTED:

DATED July 16, 2021

## HOLLAND & HART LLP

*/s/ S. Jordan Walsh*

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Matthew T. Cecil (Nevada Bar No. 9525)  
5441 KIETZKE LANE, SUITE 200  
RENO, NV 89511-2094  
Attorneys for Defendants

DATED July 16, 2021

## WERKSMAN, JACKSON & QUINN, LLP

/s/ *Caleb Mason*

Caleb E. Mason, Esq. (Ca Bar No. 246653,  
Pro Hac Vice)  
Werksman, Jackson & Quinn, LLP  
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(213)688-0460  
Attorneys for Plaintiff

DATED July 16, 2021

## LAW OFFICES OF MARK KILBURN

/s/ *Mark Kilburn*

Mark Kilburn (Nevada Bar No. 1702)  
327 S. Arlington Avenue  
Reno, NV 89501  
kilburnlaw@sbcglobal.net  
Attorneys for Plaintiff

## IT IS SO ORDERED:

UNITED STATES DISTRICT COURT

DATED: July 16, 2021

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**CERTIFICATE OF SERVICE**

2 I am, and was when the herein described mailing took place, a citizen of the United States,  
3 over 18 years of age, and not a party to, nor interested in, the within action; that on the 15th day  
4 of July, 2021, I served a true and correct copy of the STIPULATION FOR EXTENSION OF  
TIME TO REPLY TO PLAINTIFF'S OPPOSITION, ET. AL.; ORDER by electronic  
transmission to the parties on electronic file and/or depositing same in the United States mail,  
first class postage fully prepaid to the persons and addresses listed below as follows:

5  
6 CALEB E. MASON  
7 WERKSMAN JACKSON & QUINN, LLP  
8 888 West Sixth Street, Fourth Floor  
9 Los Angeles, California 90017  
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17 /s/Amanda De La Rosa  
18 An Employee of Holland & Hart LLP

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